Comparison of Operating the National School Lunch Program (NSLP), Seamless Summer Option (SSO), and Summer Food Service Program (SFSP) for School Food Authorities in School Year 2020- 21 through December 31, 2020

On June 25, 2020, the U.S. Department of Agriculture (USDA) released five nationwide waivers to extend and create flexibilities for the School Breakfast Program (SBP) and NSLP through June 30, 2021. This includes schools participating in the Community Eligibility Provision (CEP). Additionally, on August 31, 2020, the USDA released nine nationwide waivers to extend flexibilities for the SFSP and SSO through December 31, 2020. For a summary of the applicable waivers for the SBP/NSLP, SFSP, and SSO, see "USDA Nationwide Waivers for Child Nutrition Programs" on page 9. Sponsors must apply to the CSDE to implement these waivers using the *Application for Meal Service through the SFSP and SSO during School Year 2020-21 through December 31*, 2020.

Note: This chart is for informational purposes only. It is not inclusive of all USDA regulations and rules governing the NSLP, SSO, and SFSP; or the topics below. Information is subject to change. USDA reserves the right to withdraw approval for operating the SFSP and SSO during school year (SY) 2020-21 subject to the availability of funding.

For additional guidance, please contact the Connecticut State Department of Education's (CSDE) school nutrition programs staff and Summer Meals staff.

| USDA Requirements | | | |
|----------------------|---|---|--|
| Topic | NSLP, SBP, and Afterschool Snack Program (ASP) | SSO | SFSP (only for currently approved sponsors) |
| Eligible sponsors | School food authorities (SFAs). | SFAs currently administering the NSLP and/or SBP. | SFAs, local government agencies, private non-profit organizations, universities or colleges, community and faith-based organizations. SFAs are waived of the requirement to demonstrate financial and administrative capability for program operations. |

| | USDA Requirements | | | |
|----------------|---|--|--|--|
| Topic | NSLP, SBP, and ASP | SSO | SFSP (only for currently approved sponsors) | |
| Eligible sites | Schools: Public and private nonprofit schools of high school grade and under that are part of State's education system RCCIs: Public and licensed, non-profit, private | Sponsors approved to implement the USDA area eligibility waiver may claim meals that are served at locations that do not meet traditional Summer Meals eligibility requirements. Open sites: In the attendance area of a school or in a geographic area defined by census data where 50 percent or more of the children qualify for free or reduced price school meals, and open to community Enrolled sites: 50 percent or more of enrolled children are eligible for free or reduced price meals, determined by approved application, or operate in an eligible area. As applicable, alternative forms of data may be used to establish site eligibility, including special provision data (including Community Eligibility) under NSLP/SBP, and Census data. | Sponsors approved to implement the USDA area eligibility waiver may claim meals that are served at locations that do not meet traditional Summer Meals eligibility requirements. Open sites: In the attendance area of a school or in a geographic area defined by census data where 50 percent or more of the children qualify for free or reduced price school meals, and open to community Enrolled sites: 50 percent or more of enrolled children are eligible for free or reduced price meals, determined by approved application, or operate in an eligible area. As applicable, alternative forms of data may be used to establish site eligibility, including special provision data (including Community Eligibility) under NSLP/SBP, and Census data. | |

| | USDA Requirements | | | |
|---------------------------------|--|--|--|--|
| Topic | NSLP, SBP, and ASP | SSO | SFSP (only for currently approved sponsors) | |
| Types of meal service locations | Schools and residential child care institutions (RCCIs). | Schools, camps, churches, community centers, housing projects, libraries, migrant centers, parks, playgrounds, pools, and other public sites where children gather. CSDE encourages using school sites when possible for operations in SY 2020-21 through December 31, 2020. | Schools, camps, churches, community centers, housing projects, libraries, migrant centers, parks, playgrounds, pools, and other public sites where children gather. CSDE encourages using school sites when possible for operations in SY 2020-21 through December 31, 2020. | |
| Times of operation | Instructional days when school is in session as established by the school district (first day of school to last day of school). This includes in-person learning, hybrid, or remote learning. Cannot operate during school vacations, weekends, or holidays (i.e., any day school is not in session and, therefore, not considered an instructional day by the district). | May through September for traditional school calendar areas. October through April during unanticipated school closures. SFAs must opt in to the USDA Nationwide Waiver to operate SSO during SY 2020-21 through December 31, 2020. Can operate during school vacations, weekends, or holidays. | May through September for traditional school calendar areas. October through April during unanticipated school closures. SFAs must opt in to the USDA Nationwide Waiver to operate SFSP during SY 2020-21 through December 31, 2020. Can operate during school vacations, weekends, or holidays. | |

¹ Per the USDA, planned full or partial building closures are not considered unanticipated school closures for SY 2020-21.

| | USDA Requirements | | | |
|------------------------|---|--------------------------------------|---|--|
| Topic | NSLP, SBP, and ASP | SSO | SFSP (only for currently approved sponsors) | |
| Rates of reimbursement | NSLP/SBP/ASP rates | Same as NSLP/SBP/ASP | SFSP rates | |
| Meal cost for children | Non-CEP schools: Meal cost is based on individual student eligibility (free/reduced-price/paid). CEP schools: All students receive meals for free. | All children receive meals for free. | All children receive meals for free. | |

| | USDA Requirements | | | |
|----------------------------|---|--|---|--|
| Topic | NSLP, SBP, and ASP | SSO | SFSP (only for currently approved sponsors) | |
| Reimbursement and claiming | Non-CEP schools: Meals served are reimbursed according to each individual student's eligibility for free, reduced-priced, or full pay meals and the associated reimbursement rate. SFAs certified as meeting the meal pattern and nutrition standard requirements set forth in 7 CFR parts 210 and 220 are eligible to receive performance-based cash assistance in the amount of 7 cents for each reimbursable lunch served. CEP schools: Meals are reimbursed based on the district or schools' approved CEP claiming percentage. | SSO sponsors receive the maximum reimbursement (meals multiplied by free rates for NSLP/SBP) without regard to their actual or budgeted costs. SFAs certified as meeting the meal pattern and nutrition standard requirements set forth in 7 CFR parts 210 and 220 are eligible to receive performance-based cash assistance in the amount of 7 cents for each reimbursable lunch served. Sponsors may use reimbursements to pay for any allowable program cost. Sponsors opting in to the USDA national waiver of area eligibility may serve and claim for locations that do not meet traditional Summer Meals eligibility requirements. | SFSP sponsors receive the maximum reimbursement (meals multiplied by rates) without regard to their actual or budgeted costs. Sponsors may use reimbursements to pay for any allowable program cost. Sponsors opting in to the USDA national waiver of area eligibility may serve and claim for locations that do not meet traditional Summer Meals eligibility requirements. | |

| | USDA Requirements | | | |
|--|---|--|---|--|
| Topic | NSLP, SBP, and ASP | SSO | SFSP (only for currently approved sponsors) | |
| Age of participating students | Students enrolled in a school with high school grades and under; including persons enrolled in a school program for people with a physical or mental disability; and persons under 21 enrolled in a RCCI. | Persons 18 years or younger and persons 19 or older with a physical or mental disability, as defined by the State. | Persons 18 years or younger and persons 19 or older with a physical or mental disability, as defined by the State. | |
| Type of meals | Breakfast Lunch Afterschool snack | Breakfast Lunch Snack (AM or PM) Supper Lunch and supper cannot be reimbursed for the same day by the same site. | Breakfast Lunch Snack (AM or PM) Supper Lunch and supper cannot be reimbursed for the same day by the same site. | |
| Number of meals that can be claimed per day | Three meals. Breakfast, lunch, and afterschool snack. | Two meals (e.g., breakfast and lunch; breakfast and snack; or lunch and snack). Lunch and supper cannot be reimbursed for the same day by the same site. SSO sponsors electing to serve breakfast and lunch cannot also be reimbursed for serving a snack for the same day by the same site. | Two meals (e.g., breakfast and lunch; breakfast and snack; or lunch and snack). Lunch and supper cannot be reimbursed for the same day by the same site. SFSP sponsors electing to serve breakfast and lunch cannot also be reimbursed for serving a snack for the same day by the same site. | |

| | USDA Requirements | | | |
|--------------------------------------|---|--|--|--|
| Topic | NSLP, SBP, and ASP | SSO | SFSP (only for currently approved sponsors) | |
| Meal service time requirements | Breakfast must be served in the morning hours. Lunch must be offered between 10:00 a.m. and 2:00 p.m., unless the SFA has been approved by the CSDE to implement the meal service time waiver for the NSLP, SBP, and ASP (COVID-19 Child Nutrition Response #34). | Breakfast must be served in the morning hours. Lunch must be offered between 10:00 a.m. and 2:00 p.m. To offer meals outside of the regulated times, SFAs must be approved by the CSDE to implement the meal service time waiver for the SSO (COVID–19: Child Nutrition Response #50). An approved meal service time must be established and maintained for meals to be reimbursable. | Breakfast and snack service must be one hour or less. Lunch and supper service must be two hours or less. Three hours must elapse between the start of one meal service and the start of the next meal service, including snack service. To offer meals outside of the regulated times, SFSP sponsors must be approved by the CSDE to implement the meal service time waiver for the SFSP (COVID–19: Child Nutrition Response #50). An approved meal service time must be established and maintained for meals to be reimbursable. | |
| Meal pattern | NSLP/SBP/ASP NSLP and SBP: Meal Patterns for Grades K-12 in School Nutrition Programs (CSDE webpage) ASP: Meal Patterns for the ASP (CSDE webpage) | NSLP/SBP/ASP NSLP and SBP: Meal Patterns for Grades K-12 in School Nutrition Programs (CSDE webpage) ASP: Meal Patterns for the ASP (CSDE webpage) | SFSP or NSLP/SBP/ASP at sponsor's discretion. Sponsor must inform the CSDE of which meal pattern will be implemented. SFSP: SFSP Meal Patterns (CSDE webpage) NSLP and SBP: Meal Patterns for Grades K-12 in School Nutrition Programs (CSDE webpage) ASP: Meal Patterns for the ASP (CSDE webpage) | |
| USDA foods | .37 cents per lunch. | Same as NSLP. | 1.5 cents per lunch for sponsors and self-prep sites. | |

| | USDA Requirements | | | |
|--|--|--|---|--|
| Topic | NSLP, SBP, and ASP | SSO | SFSP (only for currently approved sponsors) | |
| Required monitoring by SFAs/sponsors | On site review of lunch counting and claiming system for each school by February 1 of each year. | Review of meal counting, claiming, and meal pattern and food safety compliance at least once during each site's operation. | Pre-operational visits before a new or problem site operates the summer program. Site visits the first week of operation. Site review during first four weeks of operation, followed by additional monitoring as needed. Monitoring during COVID-19 impacted by multiple USDA national waivers that sponsors may opt to implement. | |
| Districts contracting with a FSMC | No potential changes to the contract. | Review potential changes with sponsor's legal counsel for material change. | Review potential changes with sponsor's legal counsel for material change. | |

This chart below summaries the current USDA nationwide waivers for each Child Nutrition Program, as of September 1, 2020. There are five waivers for the NSLP, SBP, and ASP; eight waivers for the SSO; and nine waivers for the SFSP.

| | USDA Nationwide Waivers for Child Nutrition Programs | | | |
|------------------------|---|--|---|--|
| Waiver Topic | NSLP, SBP, and ASP | SSO of the NSLP | SFSP (only for currently approved sponsors) | |
| Non-congregate feeding | COVID-19 Child Nutrition Response #33: Nationwide Waiver to Allow Non- congregate Feeding in the Child Nutrition Programs – Extension #2 | COVID–19: Child Nutrition Response #54: Nationwide Waiver to Allow Non- congregate Feeding in the Summer Food Service Program and the National School Lunch Program Seamless Summer Option – EXTENSION 4 | COVID–19: Child Nutrition Response #54: Nationwide Waiver to Allow Non-congregate Feeding in the Summer Food Service Program and the National School Lunch Program Seamless Summer Option – EXTENSION 4 | |
| Meal service time | COVID-19 Child Nutrition Response #34: Nationwide Waiver to Allow Meal Service Time Flexibility in the National School Lunch Program, School Breakfast Program, and Child and Adult Care Food Program – Extension #2 | COVID–19: Child Nutrition Response #50: Nationwide Waiver of Meal Service Time Restrictions in the Summer Food Service Program and the National School Lunch Program Seamless Summer Option – EXTENSION | COVID-19: Child Nutrition Response #50: Nationwide Waiver of Meal Service Time Restrictions in the Summer Food Service Program and the National School Lunch Program Seamless Summer Option – EXTENSION | |

| | USDA Nationwide Waivers for Child Nutrition Programs | | | |
|--------------------------|---|--|---|--|
| Waiver Topic | NSLP, SBP, and ASP | SSO of the NSLP | SFSP (only for currently approved sponsors) | |
| Parent/guardian pickup | COVID-19 Child Nutrition Response #35: Nationwide Waiver to Allow Parents and Guardians to Pick Up Meals for Children – Extension #2 | COVID–19: Child Nutrition Response #55: Nationwide Waiver to Allow Parents and Guardians to Pick Up Meals for Children – EXTENSION | COVID–19: Child Nutrition Response #55: Nationwide Waiver to Allow Parents and Guardians to Pick Up Meals for Children – EXTENSION 4 | |
| Offer versus serve | COVID-19 Child Nutrition Response #37: Nationwide Waiver to Allow Offer Versus Serve Flexibility for Senior High Schools in the National School Lunch Program for School Year 2020-2021 | COVID-19: Child Nutrition Response #51: Nationwide Waiver to Allow Offer Versus Serve Flexibilities in the Summer Food Service Program – EXTENSION | COVID-19: Child Nutrition Response #51: Nationwide Waiver to Allow Offer Versus Serve Flexibilities in the Summer Food Service Program – EXTENSION | |
| Meal pattern flexibility | COVID-19 Child Nutrition Response #36: Nationwide Waiver to Allow Meal Pattern Flexibility in the Child Nutrition Programs – Extension #4 | COVID–19: Child Nutrition Response #53: Nationwide Waiver to Allow Meal Pattern Flexibility in the Summer Food Service Program and the National School Lunch Program Seamless Summer Option - EXTENSION 7 | COVID-19: Child Nutrition Response #53: Nationwide Waiver to Allow Meal Pattern Flexibility in the Summer Food Service Program and the National School Lunch Program Seamless Summer Option - EXTENSION 7 | |
| Area Eligibility | Not applicable | COVID–19: Child Nutrition Response #52: Nationwide Waiver to Extend Area Eligibility Waivers – EXTENSION 2 | COVID–19: Child Nutrition Response #52: Nationwide Waiver to Extend Area Eligibility Waivers – EXTENSION 2 | |

| | USDA Nationwide Waivers for Child Nutrition Programs | | | |
|---|--|---|---|--|
| Waiver Topic | NSLP, SBP, and ASP | SSO of the NSLP | SFSP (only for currently approved sponsors) | |
| Area Eligibility for Closed Enrolled Sites | Not applicable | COVID–19: Child Nutrition Response #48: Nationwide Waiver to Allow Area Eligibility for Closed Enrolled Sites in the Summer Food Service Program and the National School Lunch Program Seamless Summer Option – EXTENSION | COVID-19: Child Nutrition Response #48: Nationwide Waiver to Allow Area Eligibility for Closed Enrolled Sites in the Summer Food Service Program and the National School Lunch Program Seamless Summer Option – EXTENSION | |
| Continuation of SFSP and SSO through December 2020 | Not applicable | COVID–19: Child Nutrition Response #56: Nationwide Waiver to Allow Summer Food Service Program and Seamless Summer Option Operations through December 2020 | COVID–19: Child Nutrition Response #56: Nationwide Waiver to Allow Summer Food Service Program and Seamless Summer Option Operations through December 2020 | |
| First week site visits SFSP | Not applicable | Not applicable | COVID-19: Child Nutrition Response #49: Nationwide Waiver to Waive First Week Site Visits in the Summer Food Service Program – EXTENSION | |



For more information, visit the CSDE's Operation of Child Nutrition Programs during Coronavirus (COVID-19) Outbreaks webpage, or contact the school nutrition programs and Summer Meals staff in the CSDE's Bureau of Health/Nutrition, Family Services and Adult Education, 450 Columbus Boulevard, Suite 504, Hartford, CT 06103-1841.

This document is available at https://portal.ct.gov/-/media/SDE/Nutrition/COVID-19/Comparison_Chart_NSLP_SSO_SFSP_through_December2020.pdf.

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